

FILED
RICHARD W. NAGEL
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2022 MAR 24 AM 8:27

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMERT KURDISTAN (a/k/a COMERT ARDIC),

EMMA BROWN (a/k/a EMMA NUR),

ISMAIL ALTUNDAG,

Defendants.

CASE NO. 1:22-cr-029
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION CINCINNATI

JUDGE J. BARRETT

INDICTMENT

8 U. S. C. § 1324(a)(1)(A)(i, v)

THE GRAND JURY CHARGES:

COUNT 1
(Conspiracy to bring in certain aliens)

Beginning on or about October 1, 2021 and continuing through on or about November 22, 2021, in the Southern District of Ohio and elsewhere, the defendants, COMERT KURDISTAN (a/k/a COMERT ARDIC), EMMA BROWN (a/k/a EMMA NUR), and ISMAIL ALTUNDAG, and others known and unknown to the Grand Jury, did knowingly and willfully combine, confederate, conspire, and agree with each other and other persons, both known and unknown to the Grand Jury, to bring and attempt to bring in any manner whatsoever B.A. to the United States, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security.

In violation of 8 U.S.C. § 1324(a)(1)(A)(i) and (v).

COUNT 2
(Conspiracy to bring in certain aliens)

Beginning on or about October 1, 2021 and continuing through on or about November 22, 2021, in the Southern District of Ohio and elsewhere, the defendants, COMERT KURDISTAN

(a/k/a COMERT ARDIC), EMMA BROWN (a/k/a EMMA NUR), and ISMAIL ALTUNDAG, and others known and unknown to the Grand Jury, did knowingly and willfully combine, confederate, conspire, and agree with each other and other persons, both known and unknown to the Grand Jury, to bring and attempt to bring in any manner whatsoever S.B. to the United States, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security.

In violation of 8 U.S.C. § 1324(a)(1)(A)(i) and (v).

COUNT 3
(Conspiracy to bring in certain aliens)

Beginning on or about October 1, 2021 and continuing through on or about November 22, 2021, in the Southern District of Ohio and elsewhere, the defendants, COMERT KURDISTAN (a/k/a COMERT ARDIC), EMMA BROWN (a/k/a EMMA NUR), and ISMAIL ALTUNDAG, and others known and unknown to the Grand Jury, did knowingly and willfully combine, confederate, conspire, and agree with each other and other persons, both known and unknown to the Grand Jury, to bring and attempt to bring in any manner whatsoever M.C. to the United States, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security.

In violation of 8 U.S.C. § 1324(a)(1)(A)(i) and (v).

COUNT 4
(Aid and abet the bringing in of certain aliens)

Beginning on or about October 1, 2021 and continuing through on or about November 22, 2021, in the Southern District of Ohio and elsewhere, the defendants, COMERT KURDISTAN (a/k/a COMERT ARDIC), EMMA BROWN (a/k/a EMMA NUR), and ISMAIL ALTUNDAG, did knowingly and willfully aid and abet others in bringing and attempting to bring in any manner whatsoever B.A. to the United States, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security.

In violation of 8 U.S.C. § 1324(a)(1)(A)(i) and (v).

COUNT 5
(Aid and abet the bringing in of certain aliens)

Beginning on or about October 1, 2021 and continuing through on or about November 22, 2021, in the Southern District of Ohio and elsewhere, the defendants, **COMERT KURDISTAN (a/k/a COMERT ARDIC)**, **EMMA BROWN (a/k/a EMMA NUR)**, and **ISMAIL ALTUNDAG**, did knowingly and willfully aid and abet others in bringing and attempting to bring in any manner whatsoever S.B. to the United States, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security.

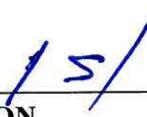
In violation of 8 U.S.C. § 1324(a)(1)(A)(i) and (v).

COUNT 6
(Aid and abet the bringing in of certain aliens)

Beginning on or about October 1, 2021 and continuing through on or about November 22, 2021, in the Southern District of Ohio and elsewhere, the defendants, **COMERT KURDISTAN (a/k/a COMERT ARDIC)**, **EMMA BROWN (a/k/a EMMA NUR)**, and **ISMAIL ALTUNDAG**, did knowingly and willfully aid and abet others in bringing and attempting to bring in any manner whatsoever M.C. to the United States, knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security.

In violation of 8 U.S.C. § 1324(a)(1)(A)(i) and (v).

A TRUE BILL



FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**



**TIMOTHY S. MANGAN
ASSISTANT UNITED STATES ATTORNEY**